

Melissa Newel (#148563)
NEWEL LAW
2625 Alcatraz Ave., Suite 132
Berkeley, CA 94705
(510) 316-3827
mnewel@newellawfirm.com

Attorney for Plaintiff
KEMA GROSS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KEMA GROSS,

Plaintiff,

v.

KILOLO KIJAKAZI,
ACTING COMMISSIONER OF
SOCIAL SECURITY,

Defendant.

No. 1:23-CV-00857 (BAM)

**STIPULATION FOR BRIEFING
EXTENSION; ~~PROPOSED~~ ORDER**

On June 5, 2023, Plaintiff Kema Gross filed the instant civil action for judicial review of the defendant Commissioner of Social Security's decision denying her application for Social Security disability benefits. (ECF Doc. 1) The Defendant responded to Plaintiff's Complaint on August 1, 2023. (ECF Doc. 11) Plaintiff's motion for summary judgment is currently due to be filed on or before August 31, 2023. (ECF Doc. 5 at p.2:15-16)

Pursuant to the Court's Scheduling Order, the parties hereby stipulate that Plaintiff be granted a first-time 30-day extension of time – to on or before October 2, 2023 (as the 30th day falls on a weekend) -- for Plaintiff to file her Opening Brief. (ECF Doc. 5, at p.3: 17-19) Plaintiff's counsel requests the briefing extension due to unexpected travel and assistance to an elderly parent requiring a rescheduling of multiple filing deadlines. Plaintiff's counsel apologizes to the Court for any inconvenience caused by the extension request. The defendant has no objection to the requested extension.

Dated: August 25, 2023

Respectfully submitted,

NEWEL LAW

By: Melissa Newel
Melissa Newel
Attorney for Plaintiff
KEMA GROSS

Dated: August 25, 2023

PHILLIP A. TALBERT
United States Attorney
MATTHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7

By: Heidi L. Triesch*
HEIDI L. TRIESCH
Special Assistant United States Attorney
Attorney for Defendant
(authorized by email dated 8/25/23)

ORDER

Good cause having been shown, IT IS ORDERED that Plaintiff shall be granted a first-time extension of thirty (30) days to file her Opening Brief. The Opening Brief shall be filed on or before **October 2, 2023** and all deadlines are modified accordingly.

IT IS SO ORDERED.

Dated: August 28, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE